

UNITED STATES DISTRICT COURT
DISTRICT OF NORTHERN WEST VIRGINIA

FILED

AUG 11 2020

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

Lamar Moore #79628-053

Plaintiff,

[Insert full name of plaintiff/prisoner]

CIVIL RIGHTS COMPLAINT

42 U.S.C. § 1983

JURY DEMAND

YES ☒ NO ☐

3:20CV 144
Groh
Tromble
Sims

-against-

WARDEN Paul Adams

Complex warden J.R. Bell

Department of Justice

Bureau of Prisons

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

- I. **Parties:** (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. **Name of plaintiff** Lamar Moore

If you are incarcerated, provide the name of the facility and address:

F.C.I. Hazelton P.O. Box 5000 Bruceton Mills,

West Virginia 26525

Prisoner ID Number: #79628-053

If you are not incarcerated, provide your current address:

Telephone Number:

B. List all defendants. You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

Paul Adams
Full Name

Warden
Job Title

F.C.I. Hazelton P.O. Box 5000 Bruceton Mills,
West Virginia 26525
Address

Defendant No. 2

J.R. Bell
Full Name

Complex Warden
Job Title

F.C.I. Hazelton P.O. Box 5000 Bruceton
Mills, West Virginia 26525
Address

Defendant No. 3

Full Name

Job Title

Address

Defendant No. 4

Full Name

Job Title

Address

Defendant No. 5

Full Name

Job Title

Address

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? F.C.I HAZELTON Knit
N2 Cell 220

When did the events happen? (include approximate time and date) March 13, 2020
June 2020
To ~~March 13, 2020~~ from 7am until 8pm

Facts: (what happened?) Warden Paul Adams Restricted me and another inmate to a cell for three months TIME. I have been allowed ^{out} my cell for only one and a half (1 1/2) hours a week. Also during this time I was not allowed Fresh air outside at all. I was Not fed Hot Food, or the privilege to clean the cell. I have also been deprived Law Library Service Privileges. I have no access to clean Laundry, regular Showers, medical or psychiatric care, exercise, and I was confined to my cell for 168 1/2 hours a week. While confined at Hazelton I was subjected to cell searches, "shakedowns". I have been deprived all administrative Remedies. Also I have been denied Religious Services for over Three months. No running water or toilets in the cells. F.C.I. Hazelton, BOP, is violating the Administrative procedure act. Inmates and I are intentionally being discriminated against, as inmates in a institution, that's allegedly Covid-19 case free, inmates and I are being deprived of our right to be free from cruel and unusual punishment, deprived of our life, liberty, without due process, and right to petition the Government for a redress of grievances. Forced to drink Contaminated water.

II.A. Injuries. If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received? 5th, and 8th Amendment violation, and 1st Amendment violations

I suffered the following injuries which form the basis of my claim:

physical pain and discomfort as a result of my exposure to this kind of treatment. Lack of air quality, and excessive noise, Severe personal uncleanness cause by lack of access to showers and or clean linen, emotional and psychological distress. In addition to those injuries I also suffered the following injuries asthma

Symptoms, High blood pressure, dizziness, nightmares, cold sweats, anxiety,
and my nerve shakes were bad at times. I was completely miserable.
"ENVIRONMENTAL ILLNESS"

III. **Relief:** State what relief you are seeking if you prevail on your complaint.

monetary settlement, To be compensated for these
egregious actions. ~~monetary~~

I declare under penalty of perjury that on 8-6-2020, I delivered this
complaint to prison authorities at Hazleton F.C.I. (date)
(name of prison)
States District Court for the ~~NORTHERN~~ District of West Virginia

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8-6-2020


Signature of Plaintiff

F.C.I HAZELTON
Name of Prison Facility or Address if not incarcerated

P.O. Box 5000 BRUCTON MILLS, West Virginia
26525

Address

79628-053
Prisoner ID#